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February 26, 2024

VIA ECF

Hon. Arun Subramanian, U.S.D.J.
United States District Court, S.D.N.Y.
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

RE: *McAlice v. The Estée Lauder Companies Inc. et. al.*, No. 1:23-cv-10669-AS

Dear Judge Subramanian:

We write on behalf of the Parties¹ pursuant to the Court's February 20, 2024 Order directing that the Parties meet, confer, and jointly propose a schedule for the filing of a consolidated amended complaint and for any motions to dismiss the consolidated amended complaint. ECF No. 38.

On December 7, 2023, Plaintiff Bridgett McAlice filed a putative class action lawsuit against Defendants alleging violations of Section 10(b) and 20(a) of the Securities Exchange Act of 1934. ECF No. 1. On January 22, 2024, Plaintiff West Virginia Laborers Pension Trust Fund filed a substantially similar suit against the same Defendants. On February 20, 2024, the Court issued an Order consolidating the two actions. ECF No. 37. Later that same day, the Court issued an Order appointing the Michigan Funds as Lead Plaintiff and approving its selection of Labaton Keller Sucharow LLP ("Labaton") as Lead Counsel. ECF No. 38.

The Parties have met, conferred, and stipulated, subject to the Court's approval, to a schedule for the filing of Lead Plaintiff's consolidated amended complaint ("Amended Complaint") and briefing on Defendants' anticipated motion to dismiss the Amended Complaint ("Motion to Dismiss"):

1. **The caption in the consolidated class action is renamed as the following:
In re The Estée Lauder Co., Inc. Securities Litigation, No. 1:23-cv-10669-AS.**
2. **Lead Plaintiff shall file an Amended Complaint by March ~~April~~ 22, 2024.**

¹ Lead Plaintiff Macomb County Employees' Retirement System, Macomb County Retiree Health Care Fund, and Wayne County Employees' Retirement System (the "Michigan Funds" or "Lead Plaintiff"), and Defendants The Estée Lauder Companies, Inc., Fabrizio Freda, and Tracey T. Travis (collectively, "Defendants," and together with Lead Plaintiff, the "Parties").





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3. Defendants shall file any Motion to Dismiss or otherwise respond to the Amended Complaint by May 3 ~~June 21~~, 2024.
4. Lead Plaintiff shall file any opposition to the Motion to Dismiss by June 3 ~~August 5~~, 2024.
5. Defendants shall file any reply in support of their Motion to Dismiss by June 17 ~~September 4~~, 2024.

The parties do not have an appearance before the Court scheduled, nor do they have any other existing deadlines.

Respectfully submitted,

/s/ Michael P. Canty

Michael P. Canty
Counsel for Lead Plaintiff and Lead Counsel for the Class

/s/ Caroline Hickey Zalka

Caroline Hickey Zalka
Counsel for Defendants

cc: All counsel of record (by ECF)

SO ORDERED.

A handwritten signature in black ink, appearing to read "Arun Subramanian".

Arun Subramanian, U.S.D.J.
Date: February 27, 2024